

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CIVIL ACTION NO.
	)	
Plaintiff,	)	JUDGE
	)	
v.	)	
	)	
\$22,310.00 IN U.S. CURRENCY,	)	
	)	<u>COMPLAINT IN FORFEITURE</u>
Defendant.	)	

NOW COMES plaintiff, the United States of America, by Justin E. Herdman, United States Attorney for the Northern District of Ohio, and Phillip J. Tripi, Assistant U.S. Attorney, and files this Complaint in Forfeiture, alleging on information and belief the following:

JURISDICTION AND INTRODUCTION

1. This Court has jurisdiction over this *in rem* proceeding pursuant to 28 U.S.C. §§ 1345 and 1355, and 21 U.S.C. § 881.
2. This Court has venue in this matter pursuant to 28 U.S.C. § 1395.
3. Defendant \$22,310.00 in U.S. Currency (hereinafter “defendant currency”) was seized on August 6, 2018. Defendant currency is now in the possession of the federal government.
4. Subsequent to the seizure, Customs and Border Protection (hereinafter “CBP”) commenced administrative forfeiture proceedings against the defendant currency. A claim to

the defendant currency was submitted in the administrative forfeiture proceeding by Michelle Moore (hereinafter “Moore”), necessitating the filing of this judicial forfeiture action.

5. The defendant currency is subject to forfeiture to the United States pursuant to 21 U.S.C. § 881(a)(6), because it constitutes proceeds traceable to drug trafficking activities and/or was used or intended to be used to facilitate drug trafficking in violation of 21 U.S.C. §§ 841(a) and/or 846.

FORFEITURE COUNT

6. On August 6, 2018, Moore was a ticketed passenger on Allegiant Airlines Flight No. 1751, departing from Cleveland, Ohio, and destined for Ft. Lauderdale, Florida.

7. During routine administrative screening of Moore and her carry-on luggage by the Transportation Safety Administration (hereinafter “TSA”), screeners observed that Moore’s carryon bag alerted for the presence of an unidentified bulk organic mass.

8. TSA officers conducted an administrative search of the luggage and discovered blue plastic grocery bag containing rubber-banded bundles of currency of mixed denominations, later determined to be defendant \$22,310.00 in U.S. Currency.

9. A TSA officer alerted Cleveland Police Division (hereinafter “CPD”) officers working the checkpoint, who notified Homeland Security Investigations (hereinafter “HSI”) of the discovery of the defendant currency.

10. Moore told CPD officers that the currency was withdrawn from her credit union over time.

11. Moore was advised by CPD that she was not under arrest and was free to go. CPD further advised Moore that HSI was responding and her luggage would be detained until

then.

12. An HSI agent arrived, identified himself, and requested Moore to voluntarily accompany agents to the HSI office at the airport to discuss the currency, which she agreed to do.

13. Moore initially claimed to be a full-time employee of the U. S. Veterans Administration (hereinafter "VA") and provided her supervisor's name.

14. Upon further questioning, Moore acknowledged that she was on medical leave from the VA for a while and is now resigned from her position.

15. Moore stated the currency in her luggage was approximately \$23,000.00 and that she was carrying approximately \$600.00 in her wallet in addition to the defendant currency.

16. Moore stated that she was travelling with the currency to deposit it in a business account, but did not identify what business she had in Florida.

17. Moore consented to a search and HSI agent observed a blue plastic bag was located within Moore's luggage, containing several bundles of U.S. Currency, rubber banded and of mixed denominations, later determined to total \$22,310.00. Her wallet contained \$787.00.

18. Moore repeatedly stated that the currency was hers and that she was not transporting it for any other person. She acknowledged that the currency in her possession had the appearance of drug proceeds, but insisted it had been withdrawn from her credit union and a canine sniff would not find the odor of narcotics on it.

19. Moore claimed she received a ride to the airport from a person she identified as Greg. She provided a last name but was unsure of the spelling of his last name. She provided a phone number, which later turned out to be an invalid number.

20. It was learned during a consensual review of Moore's cell phone that Greg was listed in her phone as "Mr. Wrong."

21. A text from Mr. Wrong from two days earlier contained only an address on Ivanhoe Road, which HSI knew to be located in a known high intensity drug trafficking area in Cleveland, Ohio.

22. Moore could not explain the text other than stating that she occasionally receives texts from him that only contain an address with no further explanation.

23. Moore explained to HSI that a receipt for a Western Union wire transfer of \$2,500.00 dated July 30, 2018, was for a money transfer to a friend in Texas who was in need of money and denied that it represented the transfer of drug proceeds.

24. Moore explained to HSI that a second receipt for a Western Union wire transfer of \$2,500.00 dated August 1, 2018, was for a money transfer to another individual and denied that it represented the transfer of drug proceeds.

25. Moore had two Ohio Direction cards, used for the electronic distribution of income-based food assistance provided by the Ohio Department of Job and Family Services, in her possession; one in her name and one in the name of Jeffrey Moore, who she identified to be her brother.

26. A certified CPD canine officer and his canine, "Hugo," conducted a controlled test at the airport, during which the canine made a positive alert for the odor of narcotics on the defendant currency.

27. HSI seized the defendant currency.

28. By reason of the foregoing, the defendant currency is subject to forfeiture to the

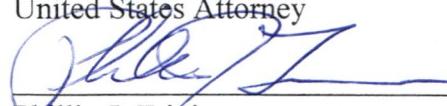
United States pursuant to the statutory authority set forth in paragraph 5 hereof.

WHEREFORE, plaintiff prays that this Court enter judgment condemning the defendant currency and forfeiting it to the United States of America for disposition according to law and for such other relief as this Court may deem just and proper.

Respectfully submitted,

JUSTIN E. HERDMAN  
United States Attorney

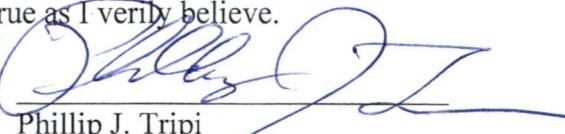
By:

  
Phillip J. Tripi  
Reg. No. 0017767  
United States Court House  
801 West Superior Avenue, Suite 400  
Cleveland, OH 44113  
Phone: (216) 622-3769  
Fax: (216) 522-7499  
Phillip.Tripi@usdoj.gov

VERIFICATION

STATE OF OHIO )  
                    )  
COUNTY OF CUYAHOGA ) SS.

I, Phillip J. Tripi, being first duly sworn, depose and say that I am an Assistant United States Attorney for the Northern District of Ohio, and one of the attorneys for the Plaintiff in this action. Under penalty of perjury I depose and say the foregoing Complaint in Forfeiture is based upon information officially provided to me and is true as I verily believe.



Phillip J. Tripi  
Assistant U.S. Attorney

Sworn to and subscribed in my presence this 11 day of December, 2018.



Diane Schneider  
Notary Public



DIANE SCHNEIDER  
NOTARY PUBLIC  
STATE OF OHIO  
COMM. EXPIRES  
3-9-2022  
RECORDED IN  
CUYAHOGA COUNTY

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM)

**I. (a) PLAINTIFFS**  
United States of America**DEFENDANTS**  
\$22,310.00 in U.S. Currency(b) County of Residence of First Listed Plaintiff \_\_\_\_\_  
(EXCEPT IN U.S. PLAINTIFF CASES)County of Residence of First Listed Defendant Cuyahoga, Ohio  
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

(c) Attorneys (Firm Name, Address, and Telephone Number)  
Phillip J. Tripi, Assistant U.S. Attorney  
801 West Superior Avenue, Suite 400, Cleveland, OH 44113  
(216) 622-3769**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> 1 U.S. Government Plaintiff | <input type="checkbox"/> 3 Federal Question<br>(U.S. Government Not a Party)          |
| <input type="checkbox"/> 2 U.S. Government Defendant            | <input type="checkbox"/> 4 Diversity<br>(Indicate Citizenship of Parties in Item III) |

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF	PTF	DEF	
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<b>PROPERTY RIGHTS</b> <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157
<b>REAL PROPERTY</b>	<b>CIVIL RIGHTS</b>	<b>PRISONER PETITIONS</b>	<b>SOCIAL SECURITY</b>	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/ Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/ Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))
			<b>FEDERAL TAX SUITS</b>	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609

**V. ORIGIN** (Place an "X" in One Box Only)

- |   |   |  |   |  |   |
|---|---|--|---|--|---|
| <input checked="" type="checkbox"/> 1 Original Proceeding | <input type="checkbox"/> 2 Removed from State Court | <input type="checkbox"/> 3 Remanded from Appellate Court | <input type="checkbox"/> 4 Reinstated or Reopened | <input type="checkbox"/> 5 Transferred from Another District (specify) _____ | <input type="checkbox"/> 6 Multidistrict Litigation |
|---|---|--|---|--|---|

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): \_\_\_\_\_

**VI. CAUSE OF ACTION**Brief description of cause:  
Civil Forfeiture Action pursuant to 21 U.S.C. Section 881(a)(6)**VII. REQUESTED IN COMPLAINT:** CHECK IF THIS IS A CLASS ACTION  
UNDER RULE 23, F.R.Cv.P.**DEMAND \$**CHECK YES only if demanded in complaint:  
**JURY DEMAND:**  Yes  No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER \_\_\_\_\_

DATE  
12/12/2018

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT \_\_\_\_\_

APPLYING IFFP

JUDGE

MAG. JUDGE \_\_\_\_\_

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO

I.

Civil Categories: (Please check one category only).

1.  General Civil
2.  Administrative Review/Social Security
3.  Habeas Corpus Death Penalty

\*If under Title 28, §2255, name the SENTENCING JUDGE: \_\_\_\_\_

CASE NUMBER: \_\_\_\_\_

II.

**RELATED OR REFILED CASES.** See LR 3.1 which provides in pertinent part: "If an action is filed or removed to this Court and assigned to a District Judge after which it is discontinued, dismissed or remanded to a State court, and subsequently refiled, it shall be assigned to the same Judge who received the initial case assignment without regard for the place of holding court in which the case was refiled. Counsel or a party without counsel shall be responsible for bringing such cases to the attention of the Court by responding to the questions included on the Civil Cover Sheet."

This action is  RELATED to another PENDING civil case. This action is  REFILED pursuant to LR 3.1.

If applicable, please indicate on page 1 in section VIII, the name of the Judge and case number.

III.

In accordance with Local Civil Rule 3.8, actions involving counties in the Eastern Division shall be filed at any of the divisional offices therein. Actions involving counties in the Western Division shall be filed at the Toledo office. For the purpose of determining the proper division, and for statistical reasons, the following information is requested.

ANSWER ONE PARAGRAPH ONLY. ANSWER PARAGRAPHS 1 THRU 3 IN ORDER. UPON FINDING WHICH PARAGRAPH APPLIES TO YOUR CASE, ANSWER IT AND STOP.

(1) **Resident defendant.** If the defendant resides in a county within this district, please set forth the name of such county

**COUNTY:** Cuyahoga

**Corporation** For the purpose of answering the above, a corporation is deemed to be a resident of that county in which it has its principal place of business in that district.

(2) **Non-Resident defendant.** If no defendant is a resident of a county in this district, please set forth the county wherein the cause of action arose or the event complained of occurred.

**COUNTY:**

(3) **Other Cases.** If no defendant is a resident of this district, or if the defendant is a corporation not having a principle place of business within the district, and the cause of action arose or the event complained of occurred outside this district, please set forth the county of the plaintiff's residence.

**COUNTY:**

IV.

The Counties in the Northern District of Ohio are divided into divisions as shown below. After the county is determined in Section III, please check the appropriate division.

**EASTERN DIVISION**

- AKRON  
 CLEVELAND  
 YOUNGSTOWN

(Counties: Carroll, Holmes, Portage, Stark, Summit, Tuscarawas and Wayne)  
(Counties: Ashland, Ashtabula, Crawford, Cuyahoga, Geauga, Lake,  
Lorain, Medina and Richland)  
(Counties: Columbiana, Mahoning and Trumbull)

**WESTERN DIVISION**

- TOLEDO

(Counties: Allen, Auglaize, Defiance, Erie, Fulton, Hancock, Hardin, Henry,  
Huron, Lucas, Marion, Mercer, Ottawa, Paulding, Putnam, Sandusky, Seneca  
Van Wert, Williams, Wood and Wyandot)

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

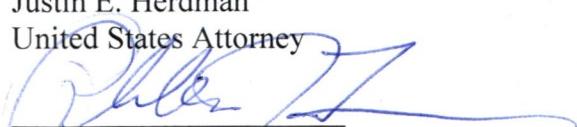
UNITED STATES OF AMERICA,	)	CIVIL ACTION NO.
	)	
Plaintiff,	)	JUDGE
	)	
v.	)	
	)	
\$22,310.00 IN U.S. CURRENCY,	)	
	)	
	)	
	)	
Defendant.	)	<u>PRAECIPE</u>

Please issue a Warrant of Arrest in Rem to the U.S. Customs and Border Protection on behalf of the United States Attorney's Office.

Respectfully submitted,

Justin E. Herdman  
United States Attorney

By:

  
Phillip J. Tripi  
Assistant U.S. Attorney  
Reg. No. 0017767  
400 United States Court House  
801 West Superior Avenue  
Cleveland, Ohio 44113  
(216) 622-3769  
Fax: (216) 522-7499  
Phillip.tripi@usdoj.gov

# United States District Court

## NORTHERN DISTRICT OF OHIO

### WARRANT OF ARREST *IN REM*

TO: THE UNITED STATES MARSHAL, U.S. CUSTOMS AND BORDER PROTECTION,  
AND/OR ANY OTHER DULY AUTHORIZED LAW ENFORCEMENT OFFICER:

WHEREAS, on 12/12/2018 a Complaint in Forfeiture  
was filed in this Court by Justin E. Herdman, United States Attorney for this District, on behalf of the United  
States, against:

\$22,310.00 in U.S. Currency

CATS Asset ID# 18-CBP-000347

and WHEREAS, the defendant properties are currently in the possession, custody or control of the United  
States; and,

WHEREAS, Rule G(3)(b)(i) of the Supplemental Rules for Admiralty or Maritime Claims and Asset  
Forfeiture Actions directs the Clerk of the Court to issue a warrant of arrest *in rem* for the arrest of the defendant  
properties; and,

WHEREAS, Rule G(3)(c) of the Supplemental Rules for Admiralty or Maritime Claims and Asset  
Forfeiture Actions provides that the warrant of arrest *in rem* must be delivered to a person or organization  
authorized to execute it;

YOU ARE COMMANDED to arrest the defendant properties by serving a copy of this warrant on the  
custodian in whose possession, custody or control the properties are presently found, and to use whatever means  
may be appropriate to protect and maintain it in your custody until further order of this Court.

YOU ARE FURTHER COMMANDED to file the same in this Court with your return thereon.

WITNESS THE HONORABLE		UNITED STATES DISTRICT JUDGE AT
DATE	CLERK  (BY) DEPUTY CLERK	
Returnable <u>-60-</u> days after issue.		

CBP		
DISTRICT	DATE RECEIVED	DATE EXECUTED
PRINTED NAME	SIGNATURE	



**Department of the Treasury**  
*Federal Law Enforcement Agencies*  
**PROCESS RECEIPT AND RETURN**

PLAINTIFF <b>United States of America</b>		COURT CASE NUMBER	
DEFENDANT \$22,310.00 in U.S. Currency		TYPE OF PROCESS <b>Warrant of Arrest in Rem</b>	
SERVE	NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE  \$22,310.00 in U.S. Currency		
AT	ADDRESS (Street or RFD, Apartment No., City, State and Zip Code)		
SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW  Phillip J. Tripi, Assistant United States Attorney Office of the United States Attorney 400 United States Courthouse Cleveland, Ohio 44113		NUMBER OF PROCESS TO BE SERVED IN THIS CASE	1
		NUMBER OF PARTIES TO BE SERVED IN THIS CASE	1
		CHECK BOX IF SERVICE IS ON USA	
SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Includes Business and Alternate Addresses, Telephone Numbers, and Estimated Times Available For Service)  CATS ID# 18-CBP-000347			
Signature of Attorney or other Originator requesting service on behalf of  <i>Phillip J. Tripi</i>		<input checked="" type="checkbox"/> PLAINTIFF <input type="checkbox"/> DEFENDANT	TELEPHONE NO. 216-622-3769
DATE 12/12/2018			
SIGNATURE AND DATE OF PERSON ACCEPTING PROCESS			
<b>SPACE BELOW FOR USE OF TREASURY LAW ENFORCEMENT AGENCY</b>			
I acknowledge receipt for the total number Of process indicated	District of Origin No.	District to Serve No.	SIGNATURE OF AUTHORIZED TREASURY AGENCY OFFICER.
DATE			
I HEREBY CERTIFY AND RETURN THAT I <input type="checkbox"/> PERSONALLY SERVED, <input type="checkbox"/> HAVE LEGAL EVIDENCE OF SERVICE, <input type="checkbox"/> HAVE EXECUTED AS SHOWN IN "REMARKS", THE PROCESS DESCRIBED ON THE INDIVIDUAL, COMPANY, CORPORATION, ETC., AT THE ADDRESS SHOWN ABOVE OR ON THE ADDRESS INSERTED BELOW			
<input type="checkbox"/> I HEREBY CERTIFY AND RETURN THAT I AM UNABLE TO LOCATE THE INDIVIDUAL, COMPANY, CORPORATION, ETC NAMED ABOVE.			
NAME & TITLE OF INDIVIDUAL SERVED IF NOT SHOWN ABOVE:		<input type="checkbox"/> A person of suitable age and discretion then residing In the defendant's usual place of abode.	
ADDRESS: (Complete only if different than shown above)		DATE OF SERVICE	TIME OF SERVICE <input type="checkbox"/> AM <input type="checkbox"/> PM
SIGNATURE, TITLE AND TREASURY AGENCY			
REMARKS:			

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CIVIL ACTION NO.
	)	
Plaintiff,	)	JUDGE
	)	
v.	)	
	)	
\$22,310.00 IN U.S. CURRENCY,	)	
	)	
	)	
Defendant.	)	<u>NOTICE</u>

Party-in-Interest:

Michelle K. Moore  
c/o Myron P. Watson  
614 W. Superior Ave.  
Cleveland, Ohio 44113

The above-captioned forfeiture action was filed in U.S. District Court on December 12, 2018. A copy of the complaint is attached. If you claim an interest in any of the defendant properties, the following applies.

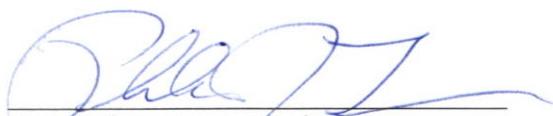
Pursuant to Rule G of the Supplemental Rules for Admiralty or Maritime and Asset Forfeiture Claims, you are required to file with the Court, and serve upon Phillip J. Tripi, plaintiff's attorney, whose address is United States Attorney's Office; United States Court House; 801 West Superior Avenue, Suite 400; Cleveland, Ohio 44113, a verified claim to the defendant

properties within thirty-five (35) days after your receipt of the complaint. Said claim shall contain the information required by Rule G(5) of the said Supplemental Rules. Additionally, you must file and serve an answer to the complaint or a motion under Rule 12 of the Civil Rules of Procedure, within twenty (20) days after the filing of the claim, exclusive of the date of filing. If you fail to do so, judgment by default will be taken for the relief demanded in the complaint.

Very truly yours,

Justin E. Herdman  
United States Attorney

Date: December 12, 2018 By:

  
Phillip J. Tripi  
Assistant U.S. Attorney  
Reg. No. 0017767  
400 United States Court House  
801 West Superior Avenue  
Cleveland, Ohio 44113  
(216) 622-3769  
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Phillip.tripi@usdoj.gov